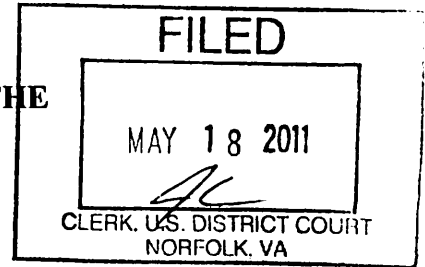


UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division



JAMES M. DUNLAP

Plaintiff,

v.

COTTMAN TRANSMISSION SYSTEMS, LLC,

and

TODD P. LEFF

Defendants.

Civil Action No. 2:11cv272

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § 1441(a), the defendants Cottman Transmission Systems, LLC ("Cottman")(which is misidentified in the Complaint as "Cottman Transmissions Systems, Inc.") and Todd P. Leff ("Leff") hereby remove this action to this Court. In support of removal, the defendants state:

1. The complaint in this action was filed in the Circuit Court for the City of Chesapeake. A copy of the summonses and complaint, which constitutes all process, pleadings, and orders served upon the defendants in this action, is attached hereto as Exhibit A,

2. Cottman initially received a copy of the summons and complaint, as filed, by service or otherwise, on or about April 30, 2011. Leff initially received a copy of the summons and complaint, as filed, by service or otherwise, on or about April 28, 2011.

3. This notice of removal is being filed within thirty days after initial receipt by each defendant of a copy of the complaint and is therefore timely pursuant to 28 U.S.C. § 1446(b).

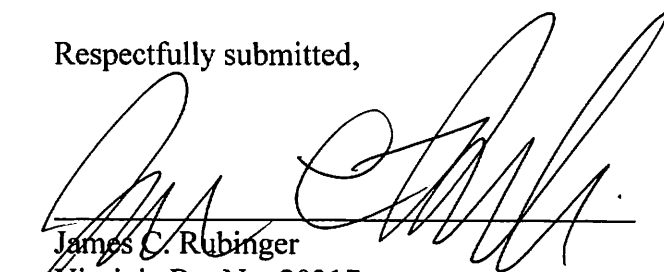
4. This action is one over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332, and is one which may be removed to this Court by the defendants pursuant to 28 U.S.C. § 1441(a).

a) This controversy is between citizens of different states. As alleged in the complaint, the plaintiff is a citizen of Virginia, residing at 1312 Debre Avenue, Norfolk, VA 23517; the defendant Cottman is a Delaware limited liability company with its principal place of business in Pennsylvania; and the defendant Leff is a citizen of Pennsylvania.

b) This is a civil action in which the matter in controversy exceeds the sum or value of seventy-five thousand dollars (\$75,000.00), exclusive of interest and costs. In the Complaint, the plaintiff prays for damages of \$ 1.2 million, plus punitive damages of \$350,000.

5. For the foregoing reasons, removal of this action to this Court is proper.

Respectfully submitted,



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May 17, 2011

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify on this 17th day of May 2011, I caused a copy of the foregoing Notice of Removal to be served by first class mail, postage pre-paid, on the plaintiff, pro se, at the following address:

James M. Dunlap
1312 Debre Avenue
Norfolk, VA 23517



James C. Rubinger